

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

\*\*\*\*\*

SUSAN COONEY, )  
Plaintiff )

v. )

SAYBROOK GRADUATE SCHOOL AND )  
RESEARCH CENTER, )  
Defendant )

\*\*\*\*\*

**PLAINTIFF SUSAN COONEY'S MOTION FOR ASSESSMENT OF  
COURT COSTS PURSUANT TO F.R.C.P. RULE 54 (d)**

Plaintiff Susan Cooney, by her counsel, respectfully moves that the Court allow her costs, as prevailing party, against defendant Saybrook Graduate School and Research Center in the amount of \$12,451.87. F.R.C.P. Rule 54(d) provides that "costs other than attorneys' fees shall be allowed as of course to the prevailing party unless the court otherwise directs." Plaintiff has limited her application to deposition costs that were "reasonably necessary," pursuant to M.R.C.P. Rule 54 (e), and to other reasonable costs that are allowable under Massachusetts and federal law. In further support of this motion, plaintiff references her Memorandum of Law and the Affidavit of Attorney Morenberg.

Respectfully submitted,  
by Plaintiffs' Counsel

/s/ Paul W. Morenberg, BBO # 631101

---

Paul W. Morenberg, BBO # 631101  
Kerstein, Coren, Lichtenstein & Finkel, LLP  
60 Walnut Street  
Wellesley, MA 02481  
(781) 997-1600

Dated: July 31, 2007